

OMB Clearance Application

**Crime Prevention Through Environmental Design:
Linking Observed School Environments with Student and School-wide
Experiences of Violence and Fear**

Supporting Statement A

4/20/2011

Department of Health and Human Services
Centers for Disease Control and Prevention
National Center for Injury Prevention and Control (NCIPC)
Division of Violence Prevention (DVP)

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A. JUSTIFICATION

A1. CIRCUMSTANCES MAKING THE COLLECTION OF INFORMATION NECESSARY

A1A. Background

The Crime Prevention Through Environmental Design (CPTED) School Study is a new information collection request (ICR) that is necessary for assessing the application of a research-based crime and violence prevention strategy in middle school settings. The Crime Prevention Through Environmental Design (CPTED) strategy has shown success in community settings, but has not been systematically tested for effectiveness in schools. Testing the applicability of CPTED principles in schools is consistent with a significant goal for the Centers for Disease Control and Prevention (CDC) through its National Center for Injury Prevention and Control (NCIPC), Division of Violence Prevention (DVP), which is to reduce the prevalence of violence among youth. Accordingly, NCIPC has initiated steps to:

- a) Explore the utility and effectiveness of CPTED principles in preventing school violence;
- b) Develop appropriate and necessary research tools to test the relevance and effectiveness of CPTED principles in school environments; and
- c) Reach conclusions concerning the value of CPTED for preventing school violence.

The information collection discussed in this application will be an important piece of this overall initiative. Specifically it will:

- a) Assess the validity of the CPTED School Assessment (CSA) tool (Appendix E), which has been developed under a prior contract, but has not yet been validated in schools; and
- b) Provide valuable information on the relationship between CPTED design and student perceptions and behaviors with respect to the safety of their school.

The larger justification for the necessity of the CPTED initiative within CDC includes the growing recognition of the importance of school safety and the growing public investment in ensuring it, and the importance of more comprehensive and sustainable approaches to violence prevention for the future of our education system and its students. These circumstances that make this information necessary will be discussed.

Patterns and Implications of School Violence

Violent and threatening behavior among youth is a persistent concern for communities, parents, and the youth themselves. Violence is a particular concern in schools where it poses a personal threat and interrupts educational achievement. In response, over the last two decades the federal government, states, local education agencies, and individual schools have taken steps to improve information about the prevalence of violence, particularly in schools. The increased attention to school violence and its implications is reflected in the following data initiative examples:

- For 10 years, the National Center for Education Statistics (NCES) and the Institute of Education Sciences (IES) in the U.S. Department of Education (ED) have teamed with the Bureau of Justice Statistics (BJS) in the U.S. Department of Justice (DOJ) to publish, annually, a document of school crime and safety issues. The most recent version of this series, *Indicators of School Crime*

and Safety 2007, offers statistics on a wide range of issues in schools, including violent deaths; other student, faculty, and staff victimization incidents; school environment; fights, weapons, and illegal substances; fear and avoidance; and discipline, safety, and security measures (Dinkes, Cataldi, Lin-Kelly, & Snyder, 2007).

- The Uniform Management Information Reporting System requirements in the *No Child Left Behind* legislation stipulate that states must make information on suspensions and expulsions for incidents related to threatening (e.g., bullying) or violent behavior available to the public for individual schools.
- The *No Child Left Behind* legislation requires states to create definitions of “persistently dangerous schools” and publicly identify those schools that meet the defined criteria.
- The *Gun Free Schools Act* sets requirements for disciplinary consequences (e.g., expulsion) for possession of firearms on school property, and requires that the ED collect and report information on these actions to Congress and the public each year.
- CDC’s Youth Risk Behavior Surveillance System (YRBSS), administered biennially in a scientific sample of the nation’s middle and high schools, contains nine items on school violence and safety.
- A recent review by the ED’s Office of Safe and Drug-Free Schools, Center for State Data Support identified 31 individual state school surveys across the nation that included information on physical safety in schools.

These examples of public commitment to gathering information on the prevalence and location of school violence and threat underscores the widespread concern about school violence in a broad range of policy areas. First, it highlights the level of public concern about the incidence of violence in our schools. Second, it demonstrates the investment of public resources to ensure that decision makers and the public are informed about prevalence and seriousness of violence in schools.

Need for More Safe Schools

The importance of physical safety in schools is self-evident. While the incidence of homicide, weapons possession on campus, and serious crime has trended downward since the early 1990’s, highly visible incidents of serious violence and crime still prompt public concern. Incidents of multiple shootings on campus are one example. The concentration of incidents in persistently dangerous schools is another.

The trend data on school violence also supports another area of need that is receiving increasing attention. Physical altercations (e.g., fighting) that do not result in serious injury (e.g., bullying, threats and minor property crime) are clearly the overwhelming majority of incidents that school officials classify as violence and threats to safety. Educators increasingly recognize the degree to which these manifestations of aggressive and violent behavior at school diminish the ability of students to learn and the importance of positive school climate for learning. Physical safety and social-emotional safety are core concerns within the school climate concept. Social-emotional safety is necessary for each child to be able to pursue their own educational potential. An important part of creating a strong school climate involves cultivating positive relationships, including respect for diversity, engagement in the school, and feelings of supportive relations from students and adults (teachers and staff) in the school environment. Reducing bullying, threatening, and physical aggression that does not meet criminal definition in schools is central

to improving school climate. CPTED is an innovative approach to building the positive school climate that is increasingly seen as a core contributor to improved educational success in the nation's schools.

The Importance of CPTED

Crime Prevention Through Environmental Design (CPTED) is the “proper design and effective use of the built environment that can lead to a reduction in the fear and incidence of crime and an improvement in the quality of life” (Crowe, 2000, p. 1). CPTED incorporates five main strategies for this type of environmental control: natural surveillance, natural access control, natural territorial enforcement, physical maintenance, and order maintenance.

- *Natural Surveillance* is the design of a physical environment—including features, interactions, and activities conducted there—to increase visibility and interpersonal interaction. This increases the threat of detection and apprehension and increases positive use of space. According to Schneider (1998) certain areas of schools and their surrounding environments are particularly susceptible to school-related violence.
- *Natural Access Control* is the ability to restrict entry or exit to a space and control foot traffic patterns to limit the opportunity for criminal or prohibited behavior.
- *Natural Territorial Reinforcement* is the use of physical attributes to delineate space to promote and express a sense of pride and ownership of an area and to send a message that unacceptable behavior will not be tolerated. Increased ownership and interest in public areas enhances student connectedness with the school environment. This school connectedness has been demonstrated to be a strong protective factor with respect to a variety of youth risk behaviors, such as substance use and delinquency, and as a contributor to positive educational attainment.
- *Physical Maintenance* is the demonstration of respect for property. Similar to natural territorial enforcement, maintenance conveys a sense of ownership, care, and upkeep to an area, which signifies frequent human presence and promotes ownership.
- *Order Maintenance* involves the clear definition of acceptable and unacceptable behaviors to promote pro-social behaviors and reduce potential prohibited or anti-social behaviors.

Legal Justification

The legal justification for this study may be found in Section 301 of the *Public Health Service Act* (42 USC 241) (Appendix A).

A1B. Privacy Impact Assessment (PIA)

The CPTED School Study has multiple data collection components. These include (1) onsite observations of 50 middle school campuses to determine the degree to which a school's physical environment incorporates CPTED design principles; (2) documentation of factual information about each school site, including any recorded occurrence of threats to safety at school; and (3) surveys of middle school students capturing their perceptions and experiences of safety and school climate. Both the onsite observations and documentation of school site information measure characteristics of the school setting, and neither instrument records personal information about individual study participants.

The CPTED Student Survey (Appendix G) does collect information about individual study participants; however, this information is collected anonymously, so we anticipate that the data collection will have little or no effect on a respondent's privacy. Some survey items (e.g., items measuring episodes of

bullying on campus), however, may be sensitive due to the emotional nature of the experience. For this reason, safeguards will be put in place to ensure that all collected data remain private.

A1C. Overview of the Data Collection System

The data collection system will include the following data components:

The CSA (Appendix E) is an observational tool for assessing physical features of the school environment. Observations using the CSA will be conducted in 50 middle schools selected to reflect variation in physical plant and school safety climate for sampled schools within the greater metro-Atlanta area. The CSA observations will be supervised by Carter & Carter Associates (C & C), a Subcontractor. Three teams of two Site Assessors, each including one CPTED Professional (either Sherry or Stan Carter of C & C) and one person hired and trained by C & C, will conduct the CSA observations. Preliminary arrangements will be made with each school to provide one-day access to the school campus and to gather preliminary data necessary for conducting the assessment, such as maps and aerials of the school, as well as the school day schedule.

The CPTED School Site Data Form (Appendix F) is an electronic form that records factual information about the school setting gathered from school records and other archival data sources. It will be completed by a designated, knowledgeable school administrator and will provide preliminary information needed to conduct the CSA (Appendix E) observations.

The CPTED Student Survey (Appendix G) is a paper-and-pencil scannable questionnaire that will be administered to approximately 3,750 students across the 50 selected middle school sites. The survey is administered by a School-Based Data Collector, an individual who will be hired and trained by a Subcontractor, ICF Macro (EMT, the prime Contractor on the project has hired ICF Macro and Carter & Carter, Assoc as a Subcontractors). The survey will be administered during class time and will take approximately 40 minutes to complete. The CPTED Student Survey is anonymous and does not include any identifying information (see A10 Assurance of Confidentiality Provided to Respondents).

The Summary of School Arrangements Form (Appendix R) is completed by the ICF Macro Recruitment Specialist using information provided by the school contact. The form details the survey administration schedule (e.g., date, time), the identity of the classes selected (e.g., teacher name, subject area, section number), the survey location (e.g., classrooms, large group setting), and the name of the school contact.

A1D. Items of Information to be Collected

The CSA (Appendix E) is designed to assess the five basic principles of CPTED: (1) Natural Surveillance; (2) Access Management; (3) Territoriality; (4) Physical Maintenance; and (5) Order Maintenance. Other factors, including access to nature, capacity, and inclusiveness, are also assessed. The rating tool is divided into the following nine sections: (1) Initial Impressions, (2) Grounds, (3) Buildings, (4) Interiors, (5) Global Impressions, (6) Additional Observations, (7) Surrounding Land Use, (8) Surrounding Land Use Conditions, and (9) Assessment Day Conditions. Items within each section are rated on a five-point Likert scale.

The CPTED School Site Data Form (Appendix F) profiles school descriptive characteristics (e.g., community context, schedule, physical plant characteristics), and records data on school policies and disciplinary procedures (38 items), absences and truancy (3 items), disciplinary actions taken (10 items),

violent deaths and other threats to safety (25 items), security and prevention practices (26 items), and prevention training (7 items).

The CPTED Student Survey (Appendix G) provides information on school climate, perceived school safety, indicators of levels of violence, school performance and attendance, and select demographics that will have importance for identifying potential effects of CPTED design principles. Specifically, the CPTED Student Survey instrument is designed to obtain detailed information about the following key constructs:

- *School Climate.* Forty-one items in six scales measure student perceptions of physical safety, supportiveness, connectedness to school and peers, environmental attractiveness, and clear and fair rules and policies. These items initiate the survey to document general student impressions of climate prior to being sensitized by the large battery of place specific questions.
- *Bullying.* Seven items in one scale measure the frequency with which the student has experienced acts of bullying in the school setting.
- *Place Specific Perceptions of Safety.* Thirteen items in one scale measure student perceptions of safety in 13 specific locations subject to CPTED design principles measured through the CSA (Appendix E).
- *Place Specific Perceptions of Violent Behavior and Threat.* Fifty-two items in four scales measure the perceived frequency with which threats are made, fights happen, substances are used, or avoidance occurs for reasons of safety in 13 specific locations subject to CPTED design principles.
- *Perceived Ability to Avoid Violence.* Eight items measure individual perceptions of ability and means of avoiding school violence.
- *Perpetration/ Victimization Concerning Violence.* Twenty-one items in two scales measure the degree to which the respondent engages in violent behavior or is victimized by violent behavior in school.
- *Individual and School Norms Concerning Acceptance of Violence.* Twenty items in two scales measure the degree to which respondents have accepting attitudes toward violence, and the degree to which they perceive that other students in their school have accepting attitudes toward violence.
- *Student Performance and Attendance.* Twelve items assess respondent grades, patterns of attendance, and reasons for non-attendance at school.
- *Individual Information.* Ten items collect basic demographic information and individual circumstances that may indicate vulnerability to bullying, threats or violence in school.

Both the CSA (Appendix E) and CPTED School Site Data Form (Appendix F) capture information about characteristics of the school setting; neither instrument records personal information about individual study participants. Schools names will be identified on data collection forms, though no school names will be linked to individual school data in aggregate reports. School administrators who complete the CPTED School Site Data Form will be asked to sign a consent form prior to completing the data form.

The CPTED Student Survey (Appendix G) is completely anonymous. Prior to participating in the survey, students must obtain written, parental consent using the CPTED Parental Permission Form and Survey Fact Sheet (Appendix I). All students who agree to participate will also be given an opportunity to decline at the time of the CPTED Student Survey through the verbal assent agreement read to them by the School-Based Data Collector (an employee of ICF Macro) prior to the survey administration.

The CPTED School Study does not collect any personally identifiable information (PII) on participants in the study; however, as a matter of standard procedure, the following protections of privacy will be implemented.

- 1) All school identifying information will be kept in secured areas at ICF Macro and no school identifying data will be included in the data files delivered to CDC;
- 2) All data files will be encrypted or password protected; and
- 3) All data collection staff will be trained by ICF Macro in protecting respondents and must receive certification of this training prior to collecting data or working with respondent data.

A1E. Identification of Website(s) and Website Content Directed at Children Under 13 Years

The information collection does not involve websites with content directed at children under 13 years of age.

A2. PURPOSE AND USE OF INFORMATION COLLECTION

The proposed CPTED School Study is guided by the goal of NCIPC to reduce the prevalence of violence among youth. Several important priorities included in the NCIPC published research agenda focus on studying how physical environments influence behavior and risk for violence. The overall purpose of the proposed study is to improve research capacity and existing knowledge concerning the effectiveness of CPTED principles for improving the safety of schools.

The CDC developed the CSA (Appendix E) as an observational tool to assess the extent to which a school's physical design is consistent with the principles of CPTED. The overall objective of the CPTED School Study is to validate the CSA tool as a useful measure of characteristics of the school environment that are associated with fear and violence-related experiences in school. If validated, the CSA may serve an important role in designing and evaluating CPTED-based interventions for schools seeking to reduce the occurrence of crime and violence. That is, it can provide information relevant to redesign physical features of the school environment to improve safety and change policies and procedures related to using the school environment.

The study has the following specific objectives.

- To develop a CPTED Student Survey (Appendix G) and a CPTED School Site Data Form (Appendix F) instrument suitable for validating the existing CSA (Appendix E) developed by CDC and to test the data quality of the CPTED Student Survey (e.g., reliability) to ensure its adequacy as a tool that may be used in further research.
- To determine the extent to which CPTED principles assessed by the CSA (Appendix E) (i.e., CSA Subscales, CSA Total Scores, and the CPTED Principles) are associated with both school-related outcomes (e.g., school climate, school safety, and school violence) and student-related outcomes

(e.g., social-emotional development and academic performance). In this research the CSA Subscales include three geographic subscales (i.e., grounds, buildings, and interiors) as well as one subscale measuring initial impressions and one measuring global impressions.

- To provide documentation of the configuration and quality of the data sets developed in the study and delivered to CDC. This documentation will support further use of the data for research in this important area of policy for safety of our nation's students.

A2B. Intentions with Respect to Use

The CPTED School Study has specific intentions with respect to use. These purposes include:

Research Synthesis

- Providing information concerning the validity of the CSA tool (Appendix E). This information will be detailed and rigorous, providing strong confirmation of the validity of the overall tool, and subscales within it.
- Contributing to the existing evidence base concerning utility of CPTED principles in schools and the relationship to student perceptions of violence, safety, and school climate.
- Providing proven tools (i.e., a validated CSA tool (Appendix E), CPTED Student Survey (Appendix G), and School Site Data Form (Appendix F) that will improve capacity for further research and development of evidence-based practices concerning CPTED principles.

Policy Development

- Building knowledge concerning the relationship between the school physical environment and school safety climate to support the development of effective public health policies and preventive intervention strategies to reduce violence in schools.
- Providing information for policy makers that can be used to develop and implement more effective strategies to achieve Healthy People 2020 Objectives concerning reduction of physical fighting among adolescents (Objective 15-38) and reduction of weapon carrying by adolescents on school property (Objective 15-39) as keys to school safety.

Technical Assistance

- Supporting potential for future use of the CSA tool (Appendix E) to help schools redesign features of a school environment to improve safety and change policies and procedures related to using the school environment.
- Providing detailed survey results to participating districts and school sites within the Metro Atlanta area about the prevalence and nature of school violence on their campuses, including information about School Climate, Place Specific Perceptions of Safety, Place Specific Perceptions of Violent Behavior and Threat, Perceived Ability to Avoid Violence, Perpetration/ Victimization Concerning

Violence, Individual and School Norms Concerning Acceptance of Violence, and Student Performance and Attendance.

A2C. Anticipated Uses of Results by Other Federal Agencies and Departments

The CPTED School Study results are of interest and use not only to CDC, but to other Federal agencies, departments, and outside organizations that participated in the delineation of the instrument content and selection/construction of questionnaire items or that share a research or policy agenda focusing on school safety, violence prevention, or environmental planning and design. The results will also be used by local school districts and school sites that participated in the study. These agencies and departments include:

Department of Education (ED), Office of Safe and Drug-Free Schools. The ED, Office of Safe and Drug-Free Schools administers, coordinates, and recommends policy related to drug and violence prevention within elementary and secondary schools and institutions of higher education. CPTED School Study findings will build knowledge of CPTED applications to support the formulation and development of education program policy and legislative proposals related to violence prevention, including *No Child Left Behind* legislation, and will contribute to shaping the national research agenda for drug and violence prevention.

Department of Health and Human Services (HHS), Office of Disease Prevention and Health Promotion. The HHS Office of Disease Prevention and Health Promotion is responsible for tracking the Healthy People 2020 Objectives through cooperation with other agencies that serve as a lead in particular areas. CPTED School Study findings could shape the selection of indicators and strategies for more effectively achieving Healthy People 2020 Objectives related to school safety, including reducing physical fighting among adolescents (Objective 15-38) and reducing weapon carrying by adolescents on school property (Objective 15-39).

The Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD), Prevention Research Branch. The NICHD conducts studies of child and adolescent behavior, including recent studies focusing on aggression and problem behaviors in middle school age children. These studies have direct relevance to findings from the CPTED School Study.

Other Agencies and Organizations. CPTED School Study findings will also inform the future research and funding agendas of university research centers, public policy organizations, and foundations that focus on issues of youth violence, school safety, and environmental planning and design. These include but are not limited to the university departments and organizations that contributed expert consultants to the study, including the Georgia State University Prevention and Intervention Research Group and Center for School Safety, the Virginia Commonwealth University Center for the Study of Prevention of Youth Violence, the Rutgers School of Criminal Justice, the University of Florida Department of Regional and Urban Planning, and the William T. Grant foundation, which awards grants to researchers and organizations working toward the goal of understanding and improving youth settings.

The contribution of CPTED School Study findings to the existing evidence-base about CPTED principles will also provide value to the numerous local, state, and national agencies and organizations that endorse the premise of CPTED and its basic principles. These organizations include, but are not limited to the:

- National Sheriff's Association
- International Association of Chiefs of Police
- American Planning Association
- American Institute of Architects
- National Crime Prevention Council
- National Crime Prevention Institute
- National League of Cities
- US Conference of Mayors
- Boys and Girls Clubs of America

The CPTED School Study will also provide direct benefit to the Metro-Atlanta area school districts and school sites participating in the study by producing a detailed profile of perceptions of violence, safety, and school climate on their school campuses.

A2D. Privacy Impact Assessment Information

The CPTED School Study has multiple data collection components. These include (1) onsite observations of 50 middle school campuses to determine the degree to which a school's physical environment incorporates CPTED design principles (2) documentation of factual information about each school site, including any recorded occurrence of threats to safety at school, and (3) surveys of middle school students capturing their perceptions and experiences of safety and school climate. Both the onsite observations and documentation of school site information measure characteristics of the school setting, and neither instrument records personal information about individual study participants.

The CPTED Student Survey (Appendix G) does collect information about individual study participants; however, this information is collected anonymously, so we anticipate that the data collection will have little or no effect on a respondent's privacy. Some survey items (e.g., items measuring episodes of bullying on campus), however, may be sensitive due to the emotional nature of the experience. For this reason, safeguards will be put in place to ensure that all collected data remain private.

No personally identifiable information is being collected.

A3. USE OF IMPROVED INFORMATION TECHNOLOGY AND BURDEN REDUCTION

During instrument development, every effort has been made to limit respondent burden. To reduce burden, the CPTED Student Survey (Appendix G) will be collected on optically scannable questionnaire booklets. Automated data collection techniques will not be used because paper-and-pencil administration is the least burdensome and most economical. This proposed data collection is not compliant with the Government Paperwork Elimination Act. However, scannable questionnaire booklets are generally regarded as the least burdensome for a school-based data collection. The data required for the study cannot be accessed from currently existing automated databases.

The CPTED School Site Data Form (Appendix F) will be administered as an electronic form (.pdf) for 100 percent of all respondents. Electronic forms will be e-mailed directly to the designated school administrator and completed forms will be returned by e-mail to the Recruitment Specialist prior to the scheduled date of the CPTED School Assessment.

A4. EFFORTS TO IDENTIFY DUPLICATION AND USE OF SIMILAR INFORMATION

Despite the widespread adoption of environmental strategies to reduce crime and improve quality of life, very little scientific research has been conducted to test and/or measure the effectiveness of the CPTED

principles as a whole or as individual components. An extensive literature search found no systematic research about CPTED variables in educational settings. No validation study of the CSA has been conducted.

A5. IMPACT ON SMALL BUSINESSES OR OTHER SMALL ENTITIES

The planned data collection does not involve small businesses or other small entities.

A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY

This request is for a one-time data collection, so frequency cannot be reduced. The sample size is designed to provide the minimal power within and between schools, and (very importantly) the necessary variance across schools to provide statistically meaningful tests of the validity of the CSA tool (Appendix E) using the criterion of correlation with student perceptions. The consequences of reduced frequency or amount of data would be an insufficient test of internal and external validity of the CSA tool across selected schools.

A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5

The data collection will be implemented in a manner consistent with 5 CFR 1320.5. No special circumstances are applicable to this proposed survey. Because this research involves a single state and region of the country as well as middle schools only, the design does not allow study results to be generalized to the population as a whole. They are generalizable, however, to the population represented by the sampling frame (i.e., the population targeted in the greater metro-Atlanta area).

A8. COMMENTS IN RESPONSE TO THE FEDERAL REGISTER NOTICE AND EFFORTS TO CONSULT OUTSIDE THE AGENCY

A8A. Federal Register Announcement

A 60-day Notice to solicit public comments was published in the Federal Register (volume 75, number 242, pages 78997) on 17 December, 2010. Appendix B contains a copy of the notice. No public comments were received.

A8B. Consultations

Consultations with experts in the field of school safety and youth violence research and methodology on the design, instrumentation, products, and statistical aspects of the surveys have occurred at critical junctures during the design of this information collection and the overall study. The purposes of such consultations were to ensure the technical soundness and user relevance of survey results; to verify the importance, relevance, and accessibility of the information sought in the survey; to assess the clarity of instructions; and to minimize respondent burden. More specifically, we consulted with Robert Cohen, PhD., Marcus Felson, PhD, Richard H. Schneider, PhD, A.I.C.P., Ed Seidman, Ph.D., and William Modzeleski, MPA, as well as a team of researchers from the Georgia State University Prevention and Intervention Research Group and Center for Research on School Safety.

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A9. EXPLANATION OF ANY PAYMENT OR GIFT TO RESPONDENTS

Each participating school will be given the opportunity to receive a modest donation of \$200 to support instruction. The \$200 school incentive is reasonable to gain school participation in the CPTED School Study without being coercive. There will be no incentive or remuneration for students who participate in the study.

A10. ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

Student surveys will be completely anonymous and do not include any personally identifiable information. Schools will be identified on the data collection records, though no school names will be linked to individual school data in aggregate reports. As a matter of standard procedure, and because school identities can be tracked to aggregate school data and profiles, the following procedures will be used by the Contractor to maintain the privacy of the data:

- 1) All school identifiable information will be kept in secured areas at ICF Macro (the subcontractor on the project) offices;

- 2) No school identifiable data will be included in the data files delivered to CDC;
- 3) Data files will be encrypted or pass-word protected; and
- 4) Data collection staff will be trained by ICF Macro in protecting confidentiality of respondents and must receive certification of this training prior to collecting data or working with identifying respondent data.

All respondents will be issued consent forms conforming to procedures that meet individual school requirements. Copies of the consent forms for the study are included in Appendix I, CPTED Parental Permission Form and Survey Fact Sheet, and Appendix K, School Administrator Consent Form. All selected schools, students, and their parents will be informed that (1) anonymity will be maintained throughout student data collection, (2) all data will be safeguarded closely, and (3) no school identifiers will be used in study reports. A School-Based Data Collector (a professional data collector trained to conduct this study) will remind students, at the the start of the survey administration, that their responses are anonymous.

No data from this research will be released to people outside of the project. Throughout data collection, all data will be maintained in a security protected computer in a locked office at ICF Macro. All data files used for statistical analyses will use unique identification numbers. With regard to information management, CPTED Student Survey (Appendix G) data will be exported directly from the secure scanned entry data base to both SPSS and SAS. Data from the CSA (Appendix E) and CPTED School Site Data Form (Appendix F) will be entered into an Excel spreadsheet and then exported to SPSS. All data will be reported in the aggregate at the school level or higher. When data is sub-set within schools, no data will be reported in displays requiring a cell size less than five. We will present aggregated school-wide data to each school and school district so that they can use the information to strengthen their approaches to promoting school safety. However, we will not present any written reports or verbal reports of data outside of a school district that could identify individual schools.

Privacy Act Assessment Information

A. Privacy Act

This submission has been reviewed by ICRO, who determined that the Privacy Act does not apply.

B. Securing Information

The CPTED School Study does not collect any personally identifiable information (PII) on participants in the study; however, as a matter of standard procedure, the following protections of privacy will be implemented.

1. All school identifying information will be kept in secured areas at ICF Macro and no school identifying data will be included in the data files delivered to CDC;
2. All data files will be encrypted or password protected; and
3. All data collection staff will be trained by ICF Macro in protecting respondents and must receive certification of this training prior to collecting data or working with respondent data.

C. Procedures for Obtaining Consent

The CPTED Student Survey (Appendix G) is completely anonymous and does not collect any personally identifiable information (PII) on participants in the study; however, prior to participating in the survey, students must obtain written, parental consent using the CPTED Parental Permission Form and Survey Fact Sheet (Appendix I). Teachers will be provided a script to be read to students making them aware of the study consent procedures - students will either receive active permission from their parents granting participation in the study or, passive permission where students will return a signed form stating that they are not to be involved in the study (Appendix H). The Parental Permission Form informs parents about the purpose of the study, and states that survey results will be kept private to the extent allowed by law, and that only study staff will be allowed to look at them. Parents are also informed that survey results will be kept for five years and will be stored in a locked filing cabinet or on a protected computer.

D. Informing Respondents about the Voluntary Nature of their Response

The CPTED School Study does not collect any personally identifiable information (PII) on participants in the study; however students whose parents have consented to their participation will be asked to verbally assent to participating in the CPTED Student Survey (Appendix G) prior to completing the survey questionnaire. The verbal assent request will be included as part of the instructions for completing the survey, contained in the CPTED Student Survey Administration Guide (Appendix Q). Students will be provided a description of what will be expected from them and will be notified that (1) their participation is voluntary, (2) they can withdraw at anytime, and (3) they may skip any question that makes them uncomfortable. Verbal assent will be required before students may begin the survey.

A11. JUSTIFICATION FOR SENSITIVE QUESTIONS

Items in the CPTED Student Survey (Appendix G) may cause some discomfort in responding. In some instances, this discomfort may be exacerbated by a student's personal circumstance. For example, if a student has been subject to bullying for quite some time, she or he might become upset while completing the survey when questions related to bullying are asked. The risks of this happening, based on our prior research and the literature, are minimal. But, in an abundance of caution due to the participation of respondents under the age of 18 years and the sensitive nature of some questions, the following safeguards will be put into place:

Acquiring Informed Consent from Parents

The parents of potential student participants will be sent a CPTED Parental Permission Form and Survey Fact Sheet (Appendix I). Parental permission for the student's participation will be obtained prior to administration of the survey. The Parental Permission Form will (1) identify CDC as the sponsor, (2) indicate the school district's support of and commitment to the research, (3) clearly specify that the survey is anonymous (i.e., no student can be identified), (4) explain that the CPTED Student Survey (Appendix G) asks questions "about violence in schools," (5) list any benefits or risks of participation, (6) specify that student participation is voluntary and that refusal to participate will result in no penalties, (7) explain that after agreeing to participate the student may revoke this agreement, (8) state that students may skip any question that they do not wish to answer, and (9) direct parents to contact the child's school principal/teacher or the Contractor's office to obtain additional information about the study or about their child's rights as a study participant. It also will specify conformance with the *No Child Left Behind* legislation (*Public Law 107-110, 2001*) that parents may review a copy of the survey at the school.

Students whose parents have consented to their participation will be asked to verbally assent to participating in the CPTED Student Survey (Appendix G) prior to completing the survey questionnaire.

This verbal assent request will be delivered by research staff who will be on site at participating schools to oversee the survey administration. The verbal assent request will be included as part of the instructions for completing the survey, contained in the CPTED Student Survey Administration Guide (Appendix Q). Students will be provided a description of what will be expected from them and will be notified that (1) their participation is voluntary, (2) they can withdraw at anytime, and (3) they may skip any question that makes them uncomfortable. Verbal assent will be required before students may begin the survey. Students who do not verbally assent to participate will be excused from the survey administration and will be tracked on the CPTED Student Survey Data Collection Checklist (Appendix N).

Obtaining Informed Consent from School Administrators

The CPTED School Site Data Form (Appendix F) records factual information about the school setting, and therefore, presents no risk to the administrators completing the survey. However, the administrators who participate will be asked to read and sign a School Administrator Consent Form (Appendix K) prior to completing the electronic survey form. This form will indicate the overall study background and purpose, the purpose of the particular survey, and its risks and benefits. It will inform administrators that their participation is voluntary, that they may skip any questions that they do not wish to answer, and that they can withdraw at anytime. Administrators will be asked to indicate 'yes' to agree to participate in the study indicating their consent. If the administrator changes his/her mind and wishes to discontinue the survey, they may do so without penalty.

Protecting and Securing Information

The CPTED Student Survey (Appendix G) is anonymous. No personally identifiable information will be collected. All data files used for statistical analyses will use arbitrarily assigned identification numbers. That said, all staff in contact with the data will be required to sign confidentiality agreements. Computer files will be password-protected, and non-electronic data will be stored in locked files at the ICF Macro offices. All data will be reported in aggregate and the names of the schools from which data are collected will not be identified.

Providing for Respondents Who Are Upset by Questions

To minimize the risk of respondents becoming upset by questions, ICF Macro will provide trained School-Based Data Collectors to monitor the administration of the CPTED Student Survey (Appendix G). Data Collectors will be made aware, during training, of the sensitive nature of the questions and will be taught to recognize signs of distress and respond empathetically to respondents who show any signs of being upset or who request help. As a condition of school district recruitment, we will obtain assurance that within-district resources will be made available to students to provide them with support if they become upset or require assistance following their participation in the survey. In addition, all students will be referred to school counselors (or another designated school official) if they are in distress. The Data Collectors will also report such cases to the Survey Coordinator.

A12. ESTIMATES OF ANNUALIZED BURDEN HOURS AND COSTS

A12A. Annualized Burden Hours

Fifty middle schools, in 14 targeted school districts in the greater Metro-Atlanta area, will be selected to participate in the study. Using the CSA tool (Appendix E), trained CPTED Site Assessors from Carter & Carter Associates will collect observational data for each of the 50 school sites. School personnel will only be required to check-in with Site Assessors upon their arrival at the school site and to grant access to any locked areas of the campus (e.g., school auditorium). This represents very minimal involvement of school personnel, except for in the event that school policy requires visitors to the campus to be

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accompanied by an escort. . To allow for this possibility, burden was calculated at 7 hours per school site for CPTED Assessments to be completed accompanied by a school site escort, usually janitorial staff, for a total estimated burden of 350 hours. The CPTED Student Survey (Appendix G) will be used to collect data from about 75 students from each middle school, totaling approximately 3,750 student participants. The surveys will take approximately 40 minutes to complete per student for a total estimated burden of 2500 hours. Some burden associated with distributing and tracking of parent permission forms in preparation for the survey will be imposed on teachers who will record information using the CPTED Student Survey Data Collection Checklist (Appendix N). Teacher burden associated with this activity is estimated at 20 minutes per teacher for a maximum of three teachers per school site (3 teachers x 50 school sites = 150 teachers), resulting in a total burden of 50 hours. School site information recorded on the CPTED School Site Data Form (Appendix F) will be completed by a school administrator, providing information on neighborhood and school characteristics from various sources (e.g., school district data available on the Web, U.S. Census data, and school disciplinary records). The CPTED School Site Data Form is estimated to take about 2 hours to complete for each of 50 administrators for a total burden of 100 hours. Administrative support to coordinate survey and assessment scheduling at each school site was estimated at 30 minutes per school for office administrative support staff.

As shown in Table 1, the total burden calculation in hours for students, teachers, and school administrators for this information collection is 3025 hours.

Table 1
Total Respondent Burden Hours

Form Name	Number of Respondents	Number of Responses per Respondent	Average Burden Response (in hours)	Total Burden (in hours)
CPTED Student Survey (Appendix G)	3,750	1	40/60	2500
CPTED Student Survey Data Collection Checklist (Appendix N)	150	1	20/60	50
CPTED School Site Data Form (Appendix F)	50	1	2	100
CPTED School Assessment Tool (Appendix E)	50	1	7	350
Administrative Support	50	1	30/60	25
Total estimated burden in hours				3025

A12B. Costs to Respondents

There are no direct costs to respondents or to school sites associated with participation in the study. However, indirect costs to students, teachers, school administrators, janitorial staff, and administrative support staff were calculated as the value of time spent responding to the CPTED Student Survey (Appendix G), distributing and tracking parent permission forms, completing the CPTED School Site

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Data Form (Appendix F), escorting CPTED Site Assessors while on campus, and providing basic administrative support to coordinate study activities.

The total cost burden to students to complete the CPTED Student Survey (Appendix G) was estimated at \$18,125.00, based on 2,500 total hours at the Federal minimum wage rate of \$7.25 per hour, although students will complete surveys during a standard 40-minute class period and will not be spending extra time on the survey.

The indirect burden of time spent by classroom teachers to distribute parent permission forms and to track their return using the CPTED Student Survey Data Collection Checklist (Appendix N) was calculated in cost terms using wage data from the Bureau of Labor Statistics (<http://www.bls.gov>) for the Atlanta-Sandy Springs-Marietta Metropolitan Area. The average hourly wage for Teachers, Elementary and Secondary Schools was based on an average annual salary of \$52,520 for teachers employed in the area. Since wages for occupations that do not generally work year-round, full time, are reported as annual salaries, teachers' hourly wage was calculated based on a standard 2080 hour work year ($\$52,520/2080$ hours) to estimate an hourly wage of \$25.25 per hour. Based on this estimate, the cost for teachers' time to complete the CPTED Student Survey Data Collection Checklist will be \$1,262.50 (150 teachers x 20/60 hours x \$25.25/hour).

The indirect burden of time spent by administrators to complete the CPTED School Site Data Form (Appendix F) was also calculated using wage data from the Bureau of Labor Statistics (<http://www.bls.gov>) for the Atlanta-Sandy Springs-Marietta Metropolitan Area. The average hourly wage for Education Administrators, Elementary and Secondary Schools was based on an average annual salary of \$85,400 for administrators employed in the area or an estimated \$41/hour. Based on this estimate, the cost for administrators' time to complete the CPTED School Site Data Form will be \$4,100 (50 administrators x 2 hours x \$41/hour).

The indirect burden of time spent by janitorial staff to escort CPTED Site Assessors was calculated based on an average hourly wage of \$11.27 for Janitors in the Atlanta-Sandy Springs-Marietta Metropolitan Area. Based on this estimate, the estimated cost for maintenance or janitorial staff to escort the CPTED Site Assessors will be \$3,944.50. The indirect burden for administrative support for study activities was calculated based on an average hourly wage of \$14.85 for Secretaries and Administrative Assistants for a total calculated burden of \$371.25.

The total estimated indirect cost burden of the entire information collection for students, administrators, and other school personnel was \$27,803.25.

Table 2
Annualized Costs to Respondents (Indirect)

Type of Respondents	Number	No. Responses Per Respondent	Hourly Wage Rate	Average Burden in Hours	Total Respondent Cost
Students	3,750	1	\$7.25	40/60	\$18,125.00
Teachers	150	1	\$25.25	20/60	\$1,262.50

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Type of Respondents	Number	No. Responses Per Respondent	Hourly Wage Rate	Average Burden in Hours	Total Respondent Cost
School Administrators	50	1	\$41.00	2	\$4,100.00
Maintenance/Janitorial Staff	50	1	\$11.27	7	\$3,944.50
Administrative Support	50	1	\$14.85	30/60	\$371.25
Total Estimated Cost Burden (in dollars)					\$27,803.25
<p>SOURCE Bureau of Labor Statistics, May 2009 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates, Atlanta-Sandy Springs-Marietta, GA Metropolitan Area</p> <p>NOTE Time and cost burden estimates were limited to information collection activities and did not include estimates of time expended by parents or school administrator on activities required to support the information collection, such as time completing parent permission forms for parents or recruiting school sites and classrooms for school and district administrators.</p>					

A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORD KEEPERS

Data collection for this study will not result in any additional capital, start-up, maintenance, or purchase costs to respondents or record keepers. Therefore, there is no direct financial burden to respondents other than that discussed in section A12.

A14. ANNUALIZED COST TO THE GOVERNMENT

The survey is funded under Contract No. 200-2009-32735. The total contract award to EMT Associates, Inc. and its Subcontractors, ICF Macro and C & C, is \$652,873 over a 3-year period. Thus, the annualized contract cost is \$217,624.

Table 3 provides additional detail on contractor costs, including administrative costs.

Table 3
Contractor Project Costs: Labor and Other Direct Costs

Project Task		Cost
Task 1	Planning Meeting	\$14,126
Task 2	Prepare a Project Plan	\$27,419
Task 3	Prepare Monthly Progress Reports	\$6,026

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Table 3
Contractor Project Costs: Labor and Other Direct Costs

Project Task		Cost
Task 4	Finalize Existing Drafts of OMB and IRB Packages	\$27,946
Task 5	Recruit the Study Schools	\$41,728
Task 6	Recruit and Train School-Based Data Collectors and Site Assessors	\$58,055
Task 7	Conduct CPTED Assessment, Administer CPTED Student Survey and CPTED School Site Data Form	\$257,207
Task 8	Prepare Draft Codebooks and Data Cleaning Plans	\$33,131
Task 9	Implement the Data Coding and Cleaning Plans	\$48,514
Task 10	Provide CDC with Separate Clean Electronic Databases of the CPTED Assessment, CPTED Student Survey, and CPTED School Site Data Form	\$66,567
Task 11	Prepare a Summary Document Appropriate for Sharing with Schools	\$31,478
Task 12	Disseminate the Summary Document that Incorporates CDC Comment, If Any, to Schools Who Participated in the Project	\$16,018
Task 13	Prepare a Report Summarizing All Work Performed Under this Task Order	\$24,659
NOTES: Any difference between the sum of project costs by task and the total awarded contract amount is attributable to rounding error.		

Additional costs will be incurred by the government in personnel costs of staff involved in oversight, study design, and analyses of data. A GS-13 Scientist and a GS-12 Project Officer will be involved, each for approximately 10 percent of his/her time. Direct annual costs in CDC staff time will approximate \$18,409 annually. Table 5 summarizes direct government costs. Therefore, the annualized cost to the government will be \$217,624 + \$18,409 for a total annualized project cost of \$236,033. The 3 year total for direct costs to the government is \$55,227 and \$652,873 for the project for the three-year project period, for a three year total project cost of \$708,100.

Table 4
Government Costs

Personnel	Tasks	Yearly Salary	Percent of Effort	Yearly CDC Direct
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				Costs
GS-13 Scientist	Oversee and provide guidance for project-related scientific issues	\$102,599	10%	\$10,260
GS-12 Project Officer	Oversee and provide guidance for project-related administrative issues	\$81,487	10%	\$8,149
Total		0		0

A15. EXPLANATION FOR PROGRAM CHANGES OR ADJUSTMENTS

This is a new data collection.

A16. PLANS FOR TABULATION AND PUBLICATION AND PROJECT TIME SCHEDULE

A16A. Tabulation Plans

This is the first study to examine the relationships between CPTED as measured by the CSA (Appendix E) and various outcomes for students and schools. The data collection effort is cross-sectional, comparing school-based observational data to outcomes based on CPTED Student Surveys (Appendix G) and school data recorded on the CPTED School Site Data Form (Appendix F). This will be a descriptive, exploratory investigation, with the descriptive data analyzed as described below to develop hypotheses for future confirmatory and developmental research.

School-level data will be collected using CPTED School Site Data Forms (Appendix F) completed by one administrator at a sample of 50 middle schools and the CSA (Appendix E) observational data collected at each of the schools. Within each school, student-level data will be collected from approximately 75 students at each of the 50 selected schools using the CPTED Student Survey (Appendix G).

Data analysis will consist of four phases: Data Configuration; Measurement; Modeling Independent, Moderating, Mediating and Outcome Variables; and CSA Verification.

Data Configuration

The first phase profiles the configuration of data within and across the 50 schools and 3,750 students. The analysis has the following major objectives:

- Document the basic data configuration, including amount and location of missing data, degree of variance, strength and pattern of relations between independent, moderating, mediating, and outcome/criterion variables. This establishes the basic capacity of the data set to support more complex analyses.
- Establish the degree of heterogeneity between schools. This is important for determining the degree to which there are analyzable differences in the school data set.
- Identify implications for unusable data and ways of improving the data through combining variables, clustering schools, or other measurement and analytic approaches.

Analysis methods at this stage are straightforward, including frequency distributions, select ANOVA analysis, and possibly clustering methods.

Measurement

The second phase includes the winnowing of measures from the instruments to create a smaller set of items and variables that will be most productive for analysis, and develop and test the quality of multiple item variables (e.g., scales, indices, rates, and ratios). This will also include testing the internal consistency and discriminant validity of CSA sub-scales.

Methods will include correlation, correlation matrices, item analysis, and measures of internal consistency where appropriate (e.g., Cronbach's Alpha). Factor analysis may be used if preliminary analysis demonstrates a need for more exploratory input.

Individual measures will be correlated across schools and within schools to test stability. We will also seek to consolidate highly correlated items into summary variables to simplify analysis and controls for validation.

Modeling Independent, Moderating, Mediating and Outcome Variables

The third phase of analysis will be to test the bi-variate and multi-variate relations between study variables identified for analysis. This phase will proceed through phased correlation studies in the following pattern.

- Test the correlation of moderating and mediating variables with individual criterion/outcome variables at individual (student) level in aggregate and within schools. Eliminate those that are consistently uncorrelated from further analyses.
- Test moderator effects on mediator relations with outcomes, and adjust models accordingly.
- Test bi-variate and multi-variate models of outcomes identified at the school level, and simplify.
- Identify priority co-variates to be used as controls in verification analyses for the CSA (Appendix E).

CPTED School Assessment Verification

The final phase will be full verification of the CSA (Appendix E) overall scores and sub-scales. Analyses will be (1) bi-variate correlations (n=50) of CSA measures and appropriate criterion variables in the CPTED Student Survey (Appendix G) (aggregated to school level) and the CPTED School Site Data Form (Appendix F); and (2) multi-variate regressions to replicate these correlations with controls.

A16B. Publication

Summary School Reports

Within seven months of completion of the individual school site CSA (Appendix E) observations, EMT's Project Director and Analysts will prepare and submit to CDC a summary document presenting basic descriptive analyses of the CSA and the CPTED Student Survey (Appendix G) results. This report will consist of two documents: the overview summary report and a second volume that will include the individual study results for each of the 50 schools that participated in the study. The summary report will include a brief introductory discussion of CPTED, the study design, and participating schools information. This will be followed by broad sections presenting separate item-level and domain-level descriptive summaries of CSA ratings and aggregate CPTED Student Survey responses. The final section of the school report will present summary conclusions based on data findings.

ICF Macro's administrative staff will make copies and forward the summary reports to all schools that participated in the study following review, submission and CDC approval of the revised Summary School Report (Vol. 1). At the same time, we will inform schools about the availability of their individual school site CPTED report should they be interested. This brief Summary School Report will be sent under separate cover with a letter explaining how the assessment was conducted and how the individual school can best

interpret the findings for future work in this area. No individual-level student data will be shared with the individual school sites.

Prepare Final Report

During the final year of the project, EMT’s Project Director and Analysts and ICF Macro’s Data Collection Manager, Recruitment Specialist and Survey Coordinator will prepare a final report that will cover the methodology, findings and recommendations from the CPTED School Study. The final report will include an executive summary highlighting key findings and recommendations. Input from CDC will be provided on the proposed annotated outline, which will be submitted six weeks prior to the final report date. The final report will contain the following sections and information.

1. *Executive Summary* – A five to ten page brief overview of the final report and its major findings and recommendations.
2. *Introduction* – An overview of CDC’s CPTED approach, the purpose and objectives of the multi-site school study and a description of the school sites.
3. *Study Design and Methods* – A presentation of the design elements (multiple data collection tools) and sampling plan, including site selection procedures, data collection procedures, site/study population rates of involvement and analysis plan.
4. *Study Findings* – A presentation and discussion of the results of data collection procedures (CSA (Appendix E), CPTED Student Survey (Appendix G), and CPTED School Site Data Form (Appendix F)).
5. *Summary and Recommendations* – A statement of the implications that the study will have for further CPTED development and student perceptions concerning their safety at school.

Publication

Research findings will be presented at national, regional, and state professional meetings and training events (e.g., American Criminology Association, American Sociological Association, American Educational Research Association, American Institute of Architects, Council for Educational Facility Planners, and other CPTED-related conferences). In addition, research findings will be submitted to a range of scientific journals (e.g., *American Journal of Community Psychology*, *American Educational Research Journal*, *Criminology*, *Evaluation Review*, and *The Journal of School Psychology*).

A16C. Schedule

Table 5
Tabulation and Publication Schedule

Task	Time Period
Recruit the study sites	1 month after OMB approval
Recruit and train CSA Site Assessors	1-7 months following OMB package submission
Recruit and train School-Based Data Collectors	1-3 months after OMB approval
Conduct the CPTED Assessment and administer the CPTED Student Survey and CPTED School Site Data Form	4-7 months after OMB approval

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Prepare draft codebooks and data cleaning plans	2- 7 months after OMB approval
Implement the data coding and cleaning plans.	7-10 months after OMB
Deliver electronic databases to CDC and conduct preliminary data analysis	11-12 months after OMB approval
Report preparation and writing	12-15months after OMB approval
Publication	15-17 months after OMB approval

A17. REASON(S) DISPLAY OF OMB EXPIRATION DATE IS INAPPROPRIATE

This request will display the expiration date for OMB approval.

A18. EXCEPTIONS TO CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS

There are no exceptions to the Certification for Paperwork Reduction Act Submissions.

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